



7/15/98
E.1



Michigan Consolidated Gas Company
500 Griswold Street, Detroit, Michigan 48226

313 256-5542
313 256-5251 FAX

July 15, 1998

Michael Anastasio, Esq.
Assistant Regional Counsel
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Blvd.
Chicago, IL 60604

Re: *South Green Avenue Site*
Administrative Order by Consent

Dear Mike:

Enclosed is the Administrative Order by Consent ("AOC") for the above captioned Site that has been executed on behalf of MichCon. This is the AOC that you sent to MichCon on June 29, 1998.

We at MichCon hope that the work to be performed under this AOC will be a team effort between MichCon and U.S. EPA, and we intend to work closely with U.S. EPA to ensure that the AOC is implemented appropriately and expeditiously. As you know, MichCon sent out requests for proposals ("RFPs") to four consulting firms capable of performing the Engineering Evaluation and Cost Analysis ("EE/CA") for the Site pursuant to the National Oil and Hazardous Substance Pollution Contingency Plan ("NCP"). We received proposals from three of the four firms and are now evaluating those proposals. We expect to engage a firm to conduct the EE/CA by July 24, 1998, and will begin development of the EE/CA work plan shortly thereafter.

After the EE/CA has been performed, we understand that U.S. EPA will evaluate the EE/CA and other information in the administrative record to determine if a subsurface removal is required. Under the AOC, any removal cleanup alternative for the Site will be selected by U.S. EPA under the standard procedures established by CERCLA and will otherwise be necessary and consistent with the NCP. Also, under the AOC, MichCon has accepted responsibility for implementing the subsurface removal action selected by U.S. EPA, if any is required, to the extent consistent with the NCP and necessary to address hazardous substances attributable to MichCon's prior operations at the Site.

RECEIVED

JUL 17 1998

U.S. EPA, REGION 3
Office of Regional Counsel

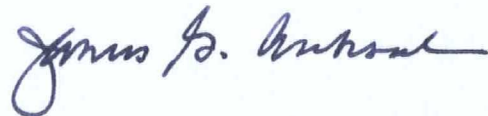
Michael Anastasio, Esq.
July 15, 1998
page 2

We at MichCon appreciate U.S. EPA's willingness to change the name of the Site to the South Green Avenue Site, and we understand that there may be a time lag associated with that change. As we also discussed, MichCon plans to work with U.S. EPA to identify and pursue other potentially responsible parties, including American Charcoal Company (now AMCOL).

In addition, MichCon accepts your assessment regarding obtaining access to the Site from the City of Detroit. After a consultant has been selected, we will contact the City of Detroit to seek access and, based on the information provided by U.S. EPA, we do not anticipate any difficulties in obtaining access to conduct the EE/CA and undertake any subsurface remediation.

We look forward to working with U.S. EPA at the Site and implementing the AOC in accordance with Section 106 and all other applicable provisions of CERCLA.

Sincerely yours,



Enclosure

c: David Maurer, Esq. - Pepper, Hamilton LLP
Abed Houssari - MichCon

F:\CORPJGA\H\AOCCOVER.DOC

RECEIVED
JUL 17 1998
U.S. EPA, Region 5
Office of Regional Counsel